

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

**FILED**

AUG 24 2020

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

JAMES )

BRAD )

HAYES )

(Enter above the NAME of the  
plaintiff in this action.) )

v. )

ANDERSON CNTY, TN & )

DEP. PERKINS (A.C.S.D.) (A/TN) )

DEP. JOHN DOE #1 )

DEP. JOHN DOE #2 )

(Enter above the NAME of each  
defendant in this action.) )

3:20-CN-375  
McDonough / Guyton

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ( ) NO (X)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: -0-

-0-

Defendants: -0-

-0-



2. COURT: (If federal court, name the district; if state court, name the county):  
\_\_\_\_\_ -0- \_\_\_\_\_
3. DOCKET NUMBER: \_\_\_\_\_ -0- \_\_\_\_\_
4. Name of Judge to whom case was assigned: \_\_\_\_\_ -0- \_\_\_\_\_
5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_ -0- \_\_\_\_\_
6. Approximate date of filing lawsuit: \_\_\_\_\_ -0- \_\_\_\_\_
7. Approximate date of disposition: \_\_\_\_\_ -0- \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT: ANDERSON CRY DETENTION Facility  
308 PUBLIC SAFETY IN CLINTON, TN 37716

- A. Is there a prisoner grievance procedure in this institution? YES (✓) NO ( )
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES (✓) NO ( )

C. If your answer is YES,

1. What steps did you take? GRIEVANCE EXHAUSTED
2. What was the result? NO RELIEF

D. If your answer to B is NO, explain why not. \_\_\_\_\_ -0- \_\_\_\_\_  
\_\_\_\_\_ -0- \_\_\_\_\_

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (✓) NO ( )

F. If your answer is YES,

1. What steps did you take? Complained to Deputies And Ridgeview (documented)

2. What was the result? NO RELIEF

### III. PARTIES

(In item A below, please print your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

A. Name of plaintiff: JAMES BRAD HAYES  
Present address: 308 public Safety Ln Clinton, TN 37716  
Permanent home address: PO Box 358 Briceville, TN 37710  
Address of nearest relative: Stacy

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

B. Defendant: Anderson Cnty, TN, / Deputy Perkins, Dep. John DOE #1  
Official position: Municipality And Deputies Dep. John DOE #2  
Place of employment: A.C.D.F. 308 public Safety Ln Clinton, TN 37716

C. Additional defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### IV. STATEMENT OF CLAIM

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

Plaintiff James Brad Hayes asserts that his constitutional rights have been violated by Officer Perkins of A.C.S.D. / Anderson Cnty, TN,



under color of law and in individual capacity, all to include  
officers John Doe #1, officer John Doe #2, both of Anderson City S.D./  
Anderson City, and by these actions described, petitioner prays  
relief hereof, upon a brief encounter with the aforesaid  
officer in which did arrest petitioner, petitioner was subjected  
to the physical beating of his person, in which was unlawful  
and also violable by E.M.S. of Anderson City, in which the  
E.M.S. official told these deputies to "stop" continuing this abuse  
of petitioner and said to "stop" you are going to kill him.  
Officers said "Fuck him, it would do Society a favor", after  
petitioner was cuffed these actions did occur also after  
petitioner was drug up a sidewalk by the cuffs behind  
his back, already beaten and in physical distress  
because of the officers conduct, petitioner was  
flamined to the pavement with hands cuffed  
behind his back and officer Perkins then forcibly  
dropped his weight on petitioners chest as a  
attempt to further cause injury to petitioner  
and E.M.S. official intervened and placed  
petitioner in custody of E.M.S. and transported  
petitioner to hospital for emergency treatment  
petitioner has suffered physical, mental  
and emotional distress, petitioner further  
asserts at NO-Time did he resist as to cause  
such actions purported, petitioner prays relief  
all parties alleged had color of law and individual  
capacities of involvement.



V. RELIEF

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.

Cite NO cases or statutes.)

injunctive Relief in removal from Service deputies in the  
Declaratory as to Unconstitutionality of  
Defendants.

Compensatory damages & Punitive Damages  
as to "color of law" and "individually"  
not to exceed 10 million dollars.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

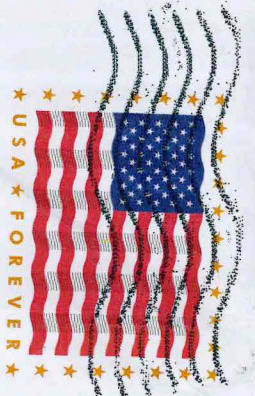
Signed this 15<sup>th</sup> day of August, 2020.

James Hayes  
Signature of plaintiff(s)

JAMES D HAYES A.C.D.F.  
308 Public Safety Ln  
CLINTON, TN 37716

RECEIVED

KNOXVILLE TN 377  
17 AUG 2020 PM 11



AUG 24 2020

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

CLERK of COURT E.d. TN  
800 MEYER ST Suite 150  
KNOXVILLE, TN 37902

The sender of this letter is  
an Anderson County Inmate

INSPECTED